

REMARKS

Upon entry of this Response, claims 1-5 are pending. No claims have been amended by this Response. Applicants respectfully request allowance of all the pending claims.

Applicants acknowledge and thank the Examiner for indicating that claims 2-5 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claim Rejection – 35 U.S.C. § 102(b)

The Examiner rejected claim 1 under 35 U.S.C. § 102(b) as being anticipated by Derwent Document No. 2006-566195 [Korea Patent Application Pub. No. KR 2005105346] ("Kim et al.").

Independent claim 1 recites a modular refrigeration unit for use in an accessible compartment of a cooler. The accessible compartment includes a first portion in communication with a display cabinet of the cooler and a second portion in communication with the environment. The modular refrigeration unit includes a wire-frame support removably positioned within the accessible compartment, and a dividing wall mounted to the wire-frame support. The divider wall is positioned between the first and second portions. The modular refrigeration unit also includes a condenser assembly that is mounted to the wire-frame support on one side of the dividing wall and that is positioned within the second portion of the accessible compartment. The modular refrigeration unit further includes an evaporator assembly that is mounted to the opposite side of the dividing wall and that is positioned within the first portion of the accessible compartment.

Kim et al. does not teach or suggest, among other things, a modular refrigeration unit including a wire-frame support that is removably positioned within an accessible compartment of a cooler and to which a condenser assembly is mounted. Rather, Kim et al. disclose a refrigerator body (10) that includes a machine room (40) arranged in an upper area of the body (10). A sound insulation plate divides the room (40) into a front space (55) and a rear space (56). An electric wire support device (60) is arranged adjacent a front side of the rear space (56) to support a plurality of electric wires inside the machine room (40).

Applicants respectfully disagree with the Examiner's contention that Kim et al. teaches a wire-frame support as claimed by Applicants. *See Office Action Dated October 2, 2008,*

Pages 2-3. The electric wire support device disclosed in Kim et al. merely supports electrical wires in the upper part of the refrigerator. The electric wire support device of Kim et al. is not a wire-frame support as claimed by Applicants. Furthermore, the electric wire support device of Kim et al. does not support a compressor assembly as recited in claim 1.

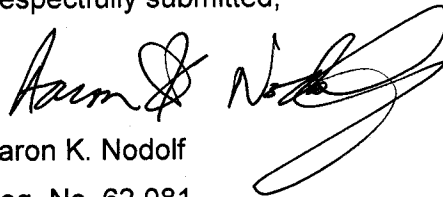
In view of the foregoing, Kim et al. do not teach or suggest each and every limitation of independent claim 1. As such, Applicants respectfully submit that claim 1 is allowable. Claims 2-5 depend from claim 9 and are also allowable for these and other reasons.

CONCLUSION

Applicants respectfully request withdrawal of the rejection and allowance of the pending claims 1-5.

The undersigned is available for telephone consultation during normal business hours.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Aaron K. Nodolf', written over a horizontal line.

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